

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

Brianna Rogers

v.

Town of Jaffrey,  
Jaffrey Police Department

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Civil Action No.: 1:25-cv-00198

**NOTICE OF REMOVAL TO CLERK OF COURT**

**NOTICE OF REMOVAL PURSUANT TO 28 U.S.C. § 1441 (Removal of Civil Actions), 28 U.S.C. § 1331 (Federal Question), 28 U.S.C. § 1367 (Supplemental Jurisdiction), and 28 U.S.C. § 1446 (Procedure for Removal)**

NOW COMES the Defendant, Town of Jaffrey, Jaffrey Police Department (“Town”), by and through its attorneys, Friedman Feeney Getman PLLC, and submits this Notice of Removal pursuant to 28 U.S.C. § 1441 (Removal of Civil Actions), 28 U.S.C. § 1331 (Federal Question), 28 U.S.C. § 1367 (Supplemental Jurisdiction), and 28 U.S.C. § 1446 (Procedure for Removal), and, in support thereof, states as follows:

1. Plaintiff commenced an action in the Cheshire County Superior Court of New Hampshire entitled *Brianna Rogers v. Town of Jaffrey, Jaffrey Police Department*, docket # 213-2025-CV-00059, alleging violations of the Equal Pay of Act of 1963, 29 U.S.C. § 206 (d), as well as the New Hampshire Law Against Discrimination, RSA 354-A:7, the New Hampshire Whistleblowers Protection Act, RSA 275-E:2, and wrongful termination in violation of New

Hampshire RSA 41:48. A true and accurate copy of the Removal Complaint is attached as Exhibit A.

2. This civil action is removable under 28 U.S.C. § 1441 because Plaintiff alleges violation of Federal law against the defendant, specifically violation of the Equal Pay Act of 1963, 29 U.S.C. § 206 (d) and gender discrimination under NH Law Against Discrimination RSA 354-A.

3. The United States District Court for the district of New Hampshire has proper subject matter jurisdiction over and is the proper venue for those claims.

4. Plaintiff also alleges state law claims that arise out the same alleged facts as the federal claims above and by which this Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367.

5. The time for removal has not expired as the Town was served on April 24, 2025. 28 U.S.C §. 1446 (b) (1).

6. A copy of this Notice of Removal has been sent to counsel for the Plaintiff. Exhibit B.

7. A copy of this Notice of Removal has been sent to the Cheshire County Superior Court. Exhibit C.

8. A civil cover sheet is filed herewith. Exhibit D.

Respectfully submitted,

TOWN OF JAFFREY,

JAFFREY POLICE DEPARTMENT

By: /s/ David Betancourt

David Betancourt, Bar Id # 15299

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**CERTIFICATE OF SERVICE**

A copy of this notice was forwarded on this day, the 23rd of May 2025, to all parties of record via email and the Court's ECF filing system.

/s/ David Betancourt